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February 24, 2025

BY ELECTRONIC FILING

Hon. Tonianne Bongiovanni, U.S.M.J.
402 East State Street
Trenton, New Jersey 08608

Re: Kim, et al. v. Hanlon, et al.
Docket No.: 3:24-cv-01098

Dear Judge Bongiovanni :

This firm is counsel to defendant Joanne Rajoppi in her official capacity as Clerk of Union County in the above-referenced action. We write briefly to address a potential scheduling issue arising out of the filing of a motion for partial summary judgment with respect to attorneys' fees by defendant-intervenor Camden County Democratic Committee ("CCDC") this past Friday, February 21, 2025, which generated an automatically set return date of March 17, 2025.

It is Clerk Rajoppi's intention to file her own motion for partial summary judgment on the issue of attorneys' fees on or before the March 14, 2025 deadline set forth in Your Honor's February 11, 2025 Text Minute Entry. That motion, given the above deadline, will not be fully briefed by the County Clerk parties before the return date of the CCDC's motion. In order to ensure that the CCDC's motion does not in any way preclude Clerk Rajoppi from filing her own motion on the issue of attorneys' fees, or result in the disposition of the same issue without my client weighing in on the identical issue before it is addressed by the Court which has set a March 17, 2025 return date, we request that the Court not rule on the CCDC's motion until Clerk Rajoppi's motion is fully briefed, and all parties who seek to be heard and brief this issue have filed their respective briefs.

The Court's continuing attention to this matter is greatly appreciated.

Respectfully submitted,

GENOVA BURNS LLC

/s/ Daniel A. Lebersfeld
DANIEL A. LEBERSFELD

c: All counsel (via electronic filing)